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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

September 28, 2021

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Mario Martinez Beltran,
21 Cr. 473 (CM)

Dear Judge McMahon:

I write to request that the Court modify Mr. Martinez Beltran's bail conditions to replace his present home-incarceration condition with home detention instead. The requested modification will permit Mr. Martinez Beltran to leave his home with the prior approval of his Pretrial Services officer for a wider range of approved activities, including employment. This modification is warranted at this time in light of Mr. Martinez Beltran's three-month track record of compliance with Pretrial supervision and his present job opportunity in a sandwich shop.

Pretrial Services consents to this application. The government takes no position.

Respectfully submitted,

/s/

Clay H. Kaminsky
Assistant Federal Defender
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cc: AUSA Danielle Kudla
USPSO Jonathan Lettieri (by email)

OK
Colleen McMahon
10/8/2021